

**BAKER BOTTS L.L.P.**

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*Counsel for Defendants*  
*Chicago Bridge & Iron Company N.V.,*  
*Philip Asherman, Ron Ballschmiede and*  
*Westley Stockton*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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IN RE CHICAGO BRIDGE & IRON	)	<b>CASE NO. 1:17-CV-1580</b>  Hon. Lorna Schofield
COMPANY N.V. SECURITIES	)	
LITIGATION	)	
	)	

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**MEMORANDUM OF LAW IN SUPPORT OF DEFENDANTS'  
MOTION IN LIMINE NO. 15**

Defendants Chicago Bridge & Iron Co. N.V. ("CB&I"), Philip K. Asherman, Ronald A. Ballschmiede, and Westley S. Stockton submit this Memorandum of Law in support of their Motion *in Limine* No. 15 to preclude any reference or comments mentioning, implying, or suggesting that there are any agreements among Defendants in this case relating to defense strategy or cost-sharing.

Such comments would be unfairly prejudicial to Defendants, would be irrelevant, and would confuse the issues and mislead the jury. FED. R. EVID. 402, 403.

Dated: December 13, 2021

Respectfully submitted,

**BAKER BOTTS L.L.P.**

By: /s/ David D. Sterling

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